

**WARNING LETTER
AND
NOTICE OF AMENDMENT**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

February 1, 1995

Mr. Steven S. Ball
Vice President - Operations & Engineering
Williams Pipe Line Company
One Williams Center
Tulsa, Oklahoma 74101

CPF No. 35508W

Dear Mr. Ball:

From October 21-27, 1994, a representative of the Department of Public Safety, State of Minnesota, acting as an agent for interstate pipelines for the Central Region, Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code, conducted an onsite pipeline safety inspection of your pipeline facilities from Rosemount, MN to Sioux Falls, SD and from Marshall, MN to Watertown, SD. Records were checked at the Roseville Office.

As a result of the inspection, it appears that you have committed probable violations, as noted below, of pipeline safety regulations, Title 49, Code of Federal Regulations, Part 195. The items inspected and the probable violations are:

1. § 195.402 - Procedural manual for operations, maintenance, and emergencies.

§ 195.402(a) Requires each operator to prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies;

- a. In December 1993, Williams conducted a navigable waterway inspection of the Red River of the North using a sonar method. The sonar method was not covered in a written procedure.

2. **§ 195.416(b) External Corrosion.**

Each operator shall maintain the test leads required for cathodic protection in such a condition that electrical measurements can be obtained to ensure adequate protection.

Williams had not maintained test leads at MP 424+23 even though the 1993 Cathodic Protection inspection stated the leads needed repair and the 1994 Cathodic Protection inspection stated test leads needed to be installed.

Under 49 United States Code § 60122, you are subject to a civil penalty not to exceed \$25,000 for each violation for each day the violation persists up to a maximum of \$500,000 for any related series of violations.

We have reviewed the circumstances and supporting documents involved for the violations in this case, and have decided not to assess you a civil penalty. We advise you, however, that should you not correct the circumstances leading to the violations, we will take enforcement action when and if the continued violations come to our attention.

In regard to item number 1, relating to deficiencies in your written procedures for operations, maintenance, and emergencies, the Office of Pipeline Safety is issuing to you a Notice of Amendment requiring that your procedures be amended to comply with the requirements of the regulations referenced.

When it is found that an operator's procedures are inadequate, 49 C.F.R. § 190.237 provides that the operator, after notice and opportunity for hearing may be required to amend its plans and procedures. This letter serves to provide you with notice of the inadequate procedures and the response options as prescribed under § 190.237. The operator is allowed thirty (30) days after receipt of such notice to submit written comments or request a hearing. After considering the material presented, the Office of Pipeline Safety is required to notify the operator of the required amendment or withdraw the notice proposing the amendment. If you do not desire to contest the notice, please provide the revised procedures within thirty (30) days of receipt of this notice.

Sincerely,

Ivan A. Huntoon
Director, Central Region
Office of Pipeline Safety